

## Anne Rogers

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**From:** Nathan Lock <nlock@mccamylaw.com>  
**Sent:** Monday, October 4, 2021 4:15 PM  
**To:** Jennie E. Rogers  
**Cc:** Anne Rogers  
**Subject:** RE: Juana Zavala v. Wal-Mart Stores East LP - did you send answers to interrogatories and document requests?

Ms. Zavala has had multiple back surgeries, and her medical bills alone are over \$300,000. I had intended to respond to your discovery after removal to Fed Court and initial disclosures, but if you prefer, I can put together a response before removal. Just let me know.

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**From:** Jennie E. Rogers [mailto:[jrogers@mmatllaw.com](mailto:jrogers@mmatllaw.com)]  
**Sent:** Saturday, October 02, 2021 1:27 PM  
**To:** Nathan Lock  
**Cc:** Anne Rogers; Jennie E. Rogers  
**Subject:** RE: Juana Zavala v. Wal-Mart Stores East LP - did you send answers to interrogatories and document requests?

Hi Nathan,

Yes. We can move your client's deposition dated. We should probably look at December, if that is okay with you.

Did you send me your interrogatory answers and responses to request for production of documents? I have no information about her injuries, treatment or medical bills. Please send me the responses as soon as you can as I need to update my client. I would like to get the subpoenas out as soon as I can.

Thanks, Jennie

Jennie E. Rogers  
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**From:** Nathan Lock <nlock@mccamylaw.com>  
**Sent:** Saturday, October 2, 2021 9:36 AM  
**To:** Jennie E. Rogers <jrogers@mmatllaw.com>  
**Cc:** Anne Rogers <a Rogers@mmatllaw.com>  
**Subject:** RE: Juana Zavala v. Wal-Mart Stores East LP - sending Answer, etc.

Jennie,

Attached is Ms. Zavala's response to your request for admissions. I presume from the nature of the requests that you will be removing the case to Federal Court. Depending on the timing of the removal, we may want to choose a different date for Ms. Zavala's deposition, but we can discuss that when we have our scheduling conference.

As always, I'm looking forward to working together again.

**NATHAN D. LOCK, ESQ.**  
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**From:** Jennie E. Rogers [<mailto:jrogers@mmatllaw.com>]

**Sent:** Sunday, September 05, 2021 4:33 PM

**To:** Nathan Lock

**Cc:** Jennie E. Rogers

**Subject:** Juana Zavala v. Wal-Mart Stores East LP - sending Answer, etc.

Dear Nathan,

Howard has asked me to handle this case. I emailing a copy of the Defendant's Answer, Jury Demand, Notice of Taking Deposition and Certificate Regarding Discovery, which I filed today. I am enclosing Defendant's Request for Admissions to Plaintiff, and Defendant's Interrogatories and Request For Production of Documents to Plaintiff.

The Notice of Taking Deposition is for the deposition of Juana Zavala to take place at your office at 11:00 a.m. on November 23, 2021. If this date or time is inconvenient, please email my paralegal, Anne Rogers, ([a Rogers@mmatllaw.com](mailto:a Rogers@mmatllaw.com)) to reschedule to a mutually convenient date.

Sincerely, Jennie

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